

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

APR 15 2016

JULIA C. DUDLEY, CLERK
BY: *[Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA

SEALED

v.

Case No.: 4:16-cr-0004

CHARLES NATHANIEL WILLIAMS

Violations:

21 U.S.C. § 841(a)(1)

18 U.S.C. § 924(c)

18 U.S.C. § 922(g)(1)

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. On or about February 6, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT TWO

The Grand Jury further charges that:

1. On or about February 10, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT THREE

The Grand Jury further charges that:

1. On or about February 13, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.
2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

The Grand Jury further charges that:

1. On or about February 13, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that being, an Astra Arms, model 200 Firecat, .25 caliber, semi-automatic pistol, in and affecting interstate or foreign commerce.
2. All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

The Grand Jury further charges that:

1. On or about February 23, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.
2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT SIX

The Grand Jury further charges that:

1. On or about February 23, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that being, a Ceska Zbrojovka, model VZ70, .32 caliber, semi-automatic pistol, in and affecting interstate or foreign commerce.
2. All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN

The Grand Jury further charges that:

1. On or about February 24, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.
2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

The Grand Jury further charges that:

1. On or about February 24, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, did knowingly carry a firearm, to wit: a Jimenez Arms, model J.A. Nine, 9 mm, semi-automatic pistol, during and in relation to a drug trafficking crime for which may be prosecuted in a Court of the United States, as set forth in Count Seven of the Indictment.
2. All in violation of Title 18, United States Code, Sections 924(c).

COUNT NINE

The Grand Jury further charges that:

1. On or about February 24, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that being, a Jimenez Arms, model J.A. Nine, 9 mm, semi-automatic pistol, in and affecting interstate or foreign commerce.
2. All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TEN

The Grand Jury further charges that:

1. On or about April 17, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.
2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

The Grand Jury further charges that:

1. On or about April 30, 2015, in the Western District of Virginia, the defendant, CHARLES NATHANIEL WILLIAMS, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.
2. All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

NOTICE OF FORFEITURE

1. Upon conviction of the felony offense alleged in this Indictment, the defendant shall forfeit to the United States:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses, pursuant to 21 U.S.C. § 853(a)(1).
- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses, pursuant to 21 U.S.C. § 853(a)(2).
- c. any interest in, claims against, and property or contractual rights affording a source of control over, the said continuing criminal enterprise, pursuant to 21 U.S.C. § 853(a)(3).
- d. any firearm used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances and/or raw materials, as described in 21 U.S.C. § 881(a)(1) and (2), and any proceeds traceable to such property, pursuant to 21 U.S.C. § 881(a)(11) and 28 U.S.C. § 2461(c).
- e. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

2. The property to be forfeited to the United States includes but is not limited to the following property:

a. **Money Judgment**

An undetermined sum of U.S. Currency and all interest and proceeds traceable thereto, in that such sum in aggregate was obtained directly or indirectly as a result of said offenses or is traceable to such property.

b. **Firearms/Ammunition**

1. Astra Arms, model 200 Firecat, .25 caliber, semi-automatic pistol, Serial No. 868739
2. Ceska Zbrojovka, model VZ70, .32 caliber, semi-automatic pistol, Serial No. 721062
3. Jimenez Arms, model J.A. Nine, 9 mm, semi-automatic pistol, Serial No. 126678

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

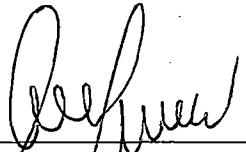
- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A True Bill this 15th day of April, 2016.

 s/Grand Jury Foreperson
FOREPERSON



JOHN P. FISHWICK, JR.
UNITED STATES ATTORNEY